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April 14, 2021

## Via: E-FILE

Hon. Robert E. Grossman U.S. Bankruptcy Court, E.D.N.Y. Alfonse M. D'Amato Courthouse 290 Federal Plaza Central Islip, New York 11722

> **RE:** In the Matter of: Diamond Finance Case No. 20-71877-reg Adversary Proceeding #8-21-08051-reg Marcos Benzaguen

Dear Judge Grossman,

Please be advised that this firm today appeared for Defendant Marcos Benzaquen in the above referenced Adversary Proceeding and the related pending contempt hearing, in the place and stead of outgoing counsel Norman Steiner, Esq.

Please be further advised that in discussion with Jonathan Koevary, Esq., special litigation counsel to Marc Pergament, the Chapter 7 Trustee in this matter, I requested that the deadline for Mr. Benzaquen to respond to the Trustee's Complaint be extended to May 24, 2021, and Mr. Koevary conveyed his consent.

On behalf of Mr. Benzaquen, we also request that the contempt hearing scheduled for next Monday, April 19, be adjourned for at least 30 days to allow my firm to become familiar with the matter and to allow counsel to confer in the hope of reaching a resolution of the issues outstanding.

Mr. Koevary consented to adjourning the contempt hearing, with the understanding that only the hearing with respect to Mr. Benzaquen be adjourned, and that all other proceedings In the Matter of Diamond Finance scheduled for April 19, 2021, go forward.

Finally, we request that the Pretrial Conference in this matter currently scheduled for April 21, 2021, be adjourned to a date convenient to this Court after May 24, 2021. Mr. Koevary also consented to this request.

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Thank you for your attention to this matter and we look forward to hearing from you shortly.

Very truly yours,

H. Nicholas Goodman

cc.: Norman Steiner, Esq. (Via Electronic Mail) Jonathan Koevary, Esq. (Via Electronic Mail)